



August 4, 2000

John H. Thompson
Associate Director for Decennial Census
Bureau of the Census
Suitland and Silver Hills Road
Building 2, Room 3586
Suitland, MD 20233

Dear Mr. Thompson:

On behalf of the American Sociological Association (ASA), we are pleased to have the opportunity to provide comments on the Department of Commerce Proposed Rule that would delegate to the Director of the Census Bureau the final determination regarding the methodology to be used in calculating the tabulations of population reported to States and localities. The ASA is the primary scientific association for sociologists with over 13,000 members dedicated to producing scientific knowledge and learning. Our research advances fundamental methods and knowledge in the social sciences and builds understanding in subfields ranging from sociology of health, education, and the family to population and demography, race and ethnicity, and work and occupations. The American Sociological Association is a member of the Secretary of Commerce's Advisory Committee for the Census 2000.

In writing, we want to express our strong support for this Proposed Rule published in the *Federal Register* on June 20, 2000. Essentially, the proposal delegates the authority for determining what data are to be released to the Director and staff experts in the Bureau of the Census. By placing this responsibility with the Census Bureau, decisionmaking regarding release of data is removed from the arena of partisan politics and situated where it appropriately belongs—with those professionals who have the training, skills, and knowledge to act in the best interests of the nation. We believe it is the scientific experts that are best positioned to reach a sound judgment about what should be done and how.

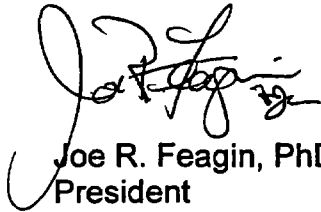
It is also noteworthy that the proposed rule has received bipartisan support, with former directors Barbara Bryant and Martha Riche both favoring delegating decisionmaking on data release to the Bureau. Both Dr. Bryant, who was appointed by President Bush to head the 1990 Census, and Dr. Riche, appointed

by President Clinton, agree that the Census Bureau brings the scientific skill and integrity to make this judgment based on the best knowledge available.

The ASA as a stakeholder has one single interest; that is, to help the nation achieve the best and most accurate count based on scientific expertise. In a democratic nation like ours, it is essential to ensure a Census that meets these standards and is not assailable on grounds of politics or partisan beliefs. In our judgment, the Proposed Rule achieves that goal by delegating authority for these complex decisions to the Director of the Bureau and the professional staff.

We look forward to continuing to contribute to an accurate Census and other significant Federal data collection systems. We remain available to provide our guidance, critiques, and expertise to the extent that they are useful.

Sincerely,



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